



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10

1200 Sixth Avenue, Suite 900
Seattle, Washington 98101-3140

AUG 18 2011

OFFICE OF
COMPLIANCE AND ENFORCEMENT

Reply To: OCE-084

CERTIFIED MAIL - RETURN RECEIPT REQUESTED

Bob Bennett
Ontario School District
195 SW 3rd Avenue
Ontario, Oregon 97914

Re: Letter of Advisement Regarding PCB Containing items (EPA 40 C.F.R. Part 761)

Dear Mr. Bennett:

This letter concerns the U.S. Environmental Protection Agency, Region 10 (the EPA) receipt of an Un-Manifested Waste report dated February 8, 2011 from US Ecology Idaho under 40 C.F.R. § 761.211. We conducted this review to determine compliance with the polychlorinated bi-phenyl (PCB) regulations that were promulgated pursuant to the Toxic Substances Control Act (TSCA).

After reviewing the transmittal letter from US Ecology Idaho and associated attachment, we discovered that the PCB light ballast materials shipped from the Ontario School District, which is located at 687 N.W. 6th Street, Ontario, Oregon, was submitted on a Non-Hazardous Waste Manifest form. The Non-Hazardous Waste Manifest document number for this shipment of PCB containing light ballasts is #11317.

40 C.F.R. §761.207(a) requires that the generator who relinquishes control over PCB wastes for commercial off-site disposal shall prepare a manifest on EPA Form 8700-22, which is the correct Hazardous Waste Manifest form, and certify by signature that the information on the form is correct. There was no generator signature on the Non-Hazardous Waste Manifest. A correct signed Hazardous Waste Manifest form was received by US Ecology Idaho via email on February 16, 2011, from Mr. Kurt Hoagland, which resolved this issue.

In an effort to assist generators of PCB waste, we are including a copy of the EPA Form 8700-22 for you to duplicate and use as needed, as well as a copy of the directions for filing out this form. Additional information on PCBs as well as a Question and Answer document can also be found at <http://www.epa.gov/epawaste/hazard/tsd/pcbs/index.htm>



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We thank you for your cooperation and attention to our concern. The EPA considers this matter closed. If you have any questions regarding this letter, you can contact Ms. Michele Wright, Regional PCB Program Specialist, at (206) 553-1747, or by email at wright.michele@epa.gov

Sincerely,

Scott E. Downey

Scott E. Downey, Manager
Pesticides and Toxics Unit

Enclosures

1. Hazardous Waste Manifest form 8700-22
2. Directions for completing form 8700-22



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Sincerely,

Scott E. Downey, Manager
Pesticides and Toxics Unit

N:/APPS/OCE/Pesticides and Toxics/Michele Wright/Advisement_Closure/Ontario sd_Veolia_Specialty ltr 070711

CONCURRENCES						
Initials:	<i>mw</i>	<i>SG</i>				
Name:	Wright	Gardner	Downey			
Date:	<i>7-19-11</i>	<i>8-17-11</i>				